

Exhibit 2



**DEPARTMENT OF AGRICULTURE
STATE OF NEW MEXICO**

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SUSANA MARTINEZ
Governor

JEFF M. WITTE
Secretary

January 27, 2015

Project Managers
Feral Swine EIS
Attn: APHIS-2013-0031-0064
USDA APHIS-WS
732 Lois Drive
Sun Prairie, WI 53590

To Whom It May Concern:

New Mexico Department of Agriculture (NMDA) submits the following comments in response to the Animal and Plant Health Inspection Service (APHIS) draft environmental impact statement (EIS) to address the need for a national feral swine damage management program [*Docket No. APHIS-2013-0031-0064*].

Local Cooperative Efforts / Early Detection and Rapid Response

Feral swine are an invasive species; as such, they should be controlled using proven invasive species management principles. NMDA supports the establishment of a national coordinated swine damage management plan that implements proven invasive species management principles. Two of these proven key principles are local cooperative management efforts and maximizing effectiveness by addressing smaller outlying populations through early detection and rapid response.

Costs associated with invasive species elimination increase in proportion to infestation size. Early detection of the presence of an invasive taxon can make the difference between being able to employ offensive strategies (eradication) and the necessity of retreating to a defensive strategy that usually means an infinite financial commitment (Rejmanek and Pitcairn 2002).

Since 2005, the number of counties in New Mexico containing feral swine has grown from 2 to 17. Through the efforts of the Cooperative Feral Swine Eradication Team and funding from USDA/APHIS, we have been able to reduce feral swine populations in key areas of the state. However, populations in other areas continue to remain stable. Much work remains to be done in order to eradicate feral swine statewide. Populations in New Mexico are geographically isolated enough, and densities low enough, to lend themselves to eradication. This is not the case in other states that are dealing with large, well established feral swine populations. Eradication in New Mexico is still a realistic goal.

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States, such as New Mexico, that still have the option to employ offensive strategies to eliminate feral swine should be the initial focus of any national coordinated effort to eliminate or control feral swine populations. Early detection and rapid response efforts, in states that can still apply offensive eradication strategies, will lead to the containment of growing feral swine populations nationwide. Containment must be achieved prior to directing additional resources to states containing core feral swine populations. Without eradication and containment (offensive strategies) as the priority, feral swine populations will continue to expand, ensuring an ever-expanding reliance on defensive strategies and the infinite financial commitment that goes along with them.

Throughout the western United States over the past 15 years, local cooperative partnership efforts have been proven to be one of the most effective and efficient ways to address invasive species management. NMDA supports a national coordinated effort to eliminate or control feral swine populations; however, its implementation must be directly linked to active local cooperative efforts if it is to be successful. Active local cooperative efforts have the cooperative human infrastructure in place to implement dynamic, on-the-ground control strategies that are able to overcome the political and geographic boundaries that so often hinder such efforts.

Potential Economic Impacts to New Mexico Agriculture

Feral swine cause approximately \$800 million in damage to agricultural crops annually in the United States (Pimentel et al., 2002). There is no detailed data on rangeland and livestock economic impacts associated with feral swine. However, reduced forage production, increased invasive plant populations, and damage to ranch infrastructure (fences, watering facilities, etc.) represent significant economic losses for livestock producers nationwide. Feral swine can harbor at least thirty diseases. These include pseudorabies, swine brucellosis, bovine tuberculosis, leptospirosis, and vesicular stomatitis. All of these are of great concern for livestock producers and could have substantial negative economic impacts on New Mexico agriculture.

NMDA is working to protect New Mexico agricultural producers from these negative economic impacts by working with the New Mexico Cooperative Feral Swine Eradication Team to eliminate feral swine in our state. By making eradication of feral swine in New Mexico the focus, NMDA's goal is to avoid the negative economic impacts associated with well established feral swine populations. NMDA appreciates USDA/APHIS recognizing agriculture as a crucial economic component of our national and state economy.

No Action Alternative

NMDA does not support the no action alternative. Continuation of current ongoing management practices will not effectively address the expanding populations of feral swine throughout the United States. NMDA would like to compliment APHIS on their effort to adapt their feral swine management program to address feral swine management in a more comprehensive and cooperative manner.

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Alternative #2

Of the five alternatives presented in the draft EIS, NMDA supports alternative two. Alternative 2 incorporates several key points:

1. **Federal Leadership with Local Decision Making** – Alternative 2 allows USDA/APHIS to take a leadership role on the national level by educating the public as well as federal, state, and local government entities. At the same time, it focuses funds used for feral swine eradication on cooperative efforts at the local level. It allows USDA/APHIS state directors the freedom to make decisions and expend funds in ways that are most effective at the state and local levels. The other alternatives presented minimize or eliminate completely this flexibility and local decision making.
2. **Directing Funds to Strategically Address Feral Swine as an Invasive Nonnative Species** – The approach outlined in Alternative 2 implements proven invasive species management principles. Two of these proven key principles are local cooperative management efforts and maximizing effectiveness by addressing smaller outlying populations through early detection and rapid response. Greater funding should be directed to states that have the potential to eradicate feral swine. Once eradication is achieved in these states, fewer dollars will be needed there to maintain the states' status. Funding can then be moved to strategically address other states that have higher populations. The other alternatives presented minimize or eliminate completely this strategic approach.
3. **Clear and Concise Goals for Eradication** – The EIS maps out the states that have the most chance of feral swine eradication and sets a deadline of 2038 to achieve eradication in those states. This is a rarity in government today. Certainly there will be challenges in achieving this goal. However, NMDA applauds USDA/APHIS for taking the lead and setting a clear goal in this EIS. NMDA believes that Alternative 2 is the best way to achieve that goal.

The New Mexico Cooperative Feral Swine Eradication Team (of which NMDA is a member) looks forward to working with USDA/APHIS on this important issue. We have the partnerships in place to immediately begin work to eradicate feral swine in New Mexico and protect our state's agricultural resources.

Thank you for your consideration regarding this matter. If you have any questions, please contact Mr. Jim Wanstall, natural resource specialist, at (505) 269-7761 or jwanstall@nmda.nmsu.edu.

Sincerely,



Jeff M. Witte

JMW/jw/ya

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Work Cited

Rejmanek, M., and M.J. Pitcairn. 2002 "When is eradication of invasive pest plants a realistic goal?"
Section of Evolution and Ecology, University of California, Davis. Available at:
http://www.issg.org/database/species/reference_files/onoaca/rejmanek.pdf

Pimentel, D., L. Lach, R. Zuniga, and D. Morrison. 2002. Environmental and economic costs associated with non-indigenous species in the United States. CRC Press, Boca Raton, FL, USA



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STATE OF NEW MEXICO**

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Susana Martinez
Governor

Jeff M. Witte
Secretary

June 11, 2013

Project Managers
Feral Swine EIS
Attn: APHIS-2013-0031
USDA APHIS-WS
732 Lois Drive
Sun Prairie, WI 53590

To Whom It May Concern:

The New Mexico Cooperative Feral Hog Eradication Team (NMCFET) submits the following comments in response to the Animal and Plant Health Inspection Service (APHIS) notice of intent to prepare an environmental impact statement (EIS) to address the need for a national feral swine damage management program [*Docket No. APHIS-2013-0031*].

Due to growing concerns regarding feral swine in New Mexico, the New Mexico Department of Agriculture (NMDA) in conjunction with the New Mexico Cattle Growers' Association, convened a feral hog summit on August 15, 2012, in Albuquerque. Approximately seventy individuals attended the summit. Among those present were state agency directors, state elected officials, representatives of federal elected officials, high ranking federal agency personnel, and private agricultural producers.

As a result of input received at that summit, the NMCFET was formed in October 2012. The team's purpose is to take available technical, financial, and educational resources and focus or coordinate them to eradicate feral swine in New Mexico. The team is composed of representatives from ten member agencies, which include:

- New Mexico Cattle Growers' Association
- Director of the New Mexico Department of Agriculture
- Director of the New Mexico Game and Fish
- State Commissioner of Public Lands
- New Mexico Department of Health, Public Health Veterinarian
- New Mexico Livestock Board, State Veterinarian

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- New Mexico State University Cooperative Extension Service, Wildlife Specialist
- Bureau of Land Management, Deputy State Director of Resources
- United States Forest Service, Wildlife Program Leader, Southwestern Region
- State Director USDA/APHIS/Wildlife Services

The cooperative nature of the team allows each entity the flexibility to contribute to the effort as they see fit and build relationships that foster mutual trust. This has made it possible to achieve on-the-ground success across jurisdictional and political boundaries.

Local Cooperative Efforts / Early Detection and Rapid Response

Feral swine are an invasive species and should be controlled using proven invasive species management principles. The NMCFET supports the establishment of a national coordinated swine damage management plan that implements proven invasive species management principles. Two of these proven key principles are local cooperative management efforts and maximum effectiveness by addressing smaller outlying populations through early detection and rapid response.

Costs associated with invasive species elimination increase in proportion to infestation size. Early detection of the presence of an invasive taxon can make the difference between being able to employ offensive strategies (eradication) and the necessity of retreating to a defensive strategy that usually means an infinite financial commitment (Rejmanek and Pitcairn 2002).

Feral swine cause over \$1 billion in damage annually in the United States. While there is no data available regarding economic impacts in New Mexico, studies in other states conservatively estimate the economic damage caused by feral hogs to be well over \$75 million annually.

Since 2005, the counties in New Mexico that contain feral hogs have grown from 2 to 17. Although the numbers continue to grow, the populations are geographically isolated enough and densities low enough to lend themselves to eradication. This is not the case in other states that are dealing with large, well established feral hog populations. Eradication in New Mexico is still a realistic goal, and the NMCFET has taken the lead in beginning the eradication effort in our state.

States that still have the option to employ offensive strategies to eliminate feral swine should be the initial focus of any national coordinated effort to eliminate or control feral swine populations. Early detection and rapid response efforts in these states will lead to the containment of growing feral swine populations nationwide. This must be achieved prior to directing additional resources to states with core feral swine populations. Without eradication and containment (offensive strategies) as the priority, feral swine populations will continue to grow, ensuring an ever-expanding reliance on defensive strategies and the infinite financial commitment that goes along with them.

Throughout the western United States over the past 15 years, local cooperative partnership efforts have been proven to be one of the most effective and efficient ways to address invasive species management. Cooperative working relationships, such as the ones that have been established through the NMCFET, are the best ways to leverage local, state, and federal resources (fiscal, technical, and

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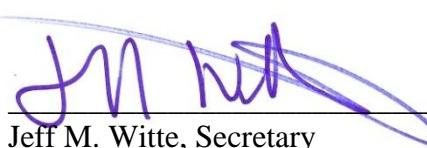
human) to address invasive species issues on the public's behalf. The NMCFET supports a national coordinated effort to eliminate or control feral swine populations; however, its implementation must be directly linked to active local cooperative efforts if it is to be successful. Active local cooperative efforts have the human infrastructure in place to implement dynamic, on-the-ground control strategies that are able to overcome the political and geographic boundaries that so often hinder such efforts.

No Action Alternative

The NMCFET does not support the no-action alternative. Continuation of current ongoing management practices will not effectively address the expanding populations of feral swine throughout the United States. The NMCFET would like to compliment APHIS on their effort to adapt their feral swine management program to address the managing in a more comprehensive and cooperative manner.

Thank you for your consideration regarding this matter. If you have any questions, please contact Mr. Jim Wanstell, NMDA natural resource specialist, at (505) 269-7761, or e-mail at jwanstell@nmda.nmsu.edu.

Sincerely,



Jeff M. Witte, Secretary
New Mexico Department of Agriculture



Dr. Ray Powell, Commissioner
State Land Office



Jim Lane, Director
New Mexico Game and Fish

/ s /

Bill Humphries
New Mexico Rancher and Landowner

JW/ya

Work Cited

Rejmanek, M., and M.J. Pitcairn. 2002 "When is eradication of invasive pest plants a realistic goal?"
Section of Evolution and Ecology, University of California, Davis. Available at:
http://www.issg.org/database/species/reference_files/onoaca/rejmanek.pdf